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11 Attorneys for Plaintiffs
 LISA TAYLOR, MICHELLE PEREZ,
 12 MARIA MARINTEZ, and BARBARA NIEMINEN

13 UNITED STATES DISTRICT COURT
 14 EASTERN DISTRICT OF CALIFORNIA

15
 16 MICHELLE PEREZ, LISA TAYLOR, MARIA
 MARTINEZ, and BARBARA NIEMINEN, on
 17 behalf of themselves and all others similarly
 situated,

18 Plaintiff,

19 vs.

20 EASTERN PLUMAS HEALTH CARE
 FOUNDATION, INC., a California
 21 Corporation,

22 Defendant.

Case No. 2:17-cv-00674-JAM-EFB

**STIPULATION AND ORDER RE:
 COMPLAINT/FIRST AMENDED
 COMPLAINT AND RESPONSE TO
 SAME**

1 **STIPULATION**

2 Plaintiffs LISA TAYLOR, MICHELLE PEREZ, MARIA MARINTEZ, and BARBARA
3 NIEMINEN (collectively, "Plaintiffs"), and EASTERN PLUMAS HEALTH CARE DISTRICT,
4 erroneously named as EASTERN PLUMAS HEALTH CARE FOUNDATION, INC. hereby
5 agree as follows:

6 1. Plaintiffs filed the complaint in this case on March 29, 2017 (the "Complaint")
7 against Eastern Plumas Health Care Foundation, Inc.

8 2. Since the filing of the Complaint, Plaintiffs have learned that Eastern Plumas
9 Health Care District is the correct Defendant. As such, Plaintiffs intend to file a First
10 Amended Complaint ("FAC") alleging the same claims and substituting Eastern Plumas
11 Health Care District for Eastern Plumas Health Care Foundation, Inc. as Defendant in this
12 action.

13 3. Eastern Plumas Health Care Foundation, Inc. and Eastern Plumas Health
14 Care District agree that Plaintiffs may file a FAC on or before May 8, 2017, dismissing
15 Eastern Plumas Health Care Foundation, Inc. and adding Eastern Plumas Health Care
16 District as Defendant, with all claims relating back to the filing of the Complaint.

17 4. Plaintiffs shall file a notice of dismissal dismissing Eastern Plumas Health
18 Care Foundation, Inc., with prejudice, no later than May 10, 2017.

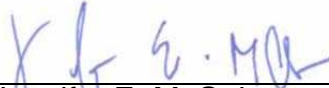
19 5. Other than the express terms in this Stipulation, Eastern Plumas Health Care
20 Foundation, Inc., Eastern Plumas Health Care District, and Plaintiffs agree that this
21 stipulation shall not affect the rights or defenses of any party to this Stipulation, including
22 Eastern Plumas Health Care District's right to seek remand, dismissal, or any other
23 procedural or substantive relief, on any grounds, in response to the filing of the FAC.

24 6. Accordingly, the parties agree to continue the deadline to respond to the
25 Complaint to May 22, 2017. Upon the timely filing of the FAC, as set forth above,
26 responsive pleading to the Complaint shall not be required. However, a timely response to
27 the FAC will be filed.

28 **IT IS SO STIPULATED.**

1 Pursuant to Civil Local Rule 131(e), concurrence in the filing of this document has
2 been obtained from Joseph Vidal Macias, Attorney for Eastern Plumas Health Care District
3 and Steven C. Gross, Attorney for Defendant Eastern Plumas Health Care Foundation, Inc.
4 on May 3, 2017.

5
6 HOYER & HICKS

7 

8 Date: May 3, 2017

9 Jennifer E. McGuire
10 Attorney for Plaintiffs LISA TAYLOR,
11 MICHELLE PEREZ, MARIA MARINTEZ,
12 and BARBARA NIEMINEN

13
14 SUTTON HAGUE LAW CORPORATION

15
16 Date: May 3, 2017

17 /s/ Joseph Vidal Macias
18 _____
19 Joseph Vidal Macias
20 Attorney for Eastern Plumas Health Care
21 District

22
23 PORTER SIMON, PROFESSIONAL
24 CORPORATION

25
26 Date: May 3, 2017

27 /s/ Steven C. Gross
28 _____
Steven C. Gross
Attorney for Defendant Eastern Plumas
Health Care Foundation, Inc

ORDER

Based upon the foregoing stipulation and good cause appearing, the terms and conditions set forth in the Stipulation are SO ORDERED.

Dated: May 3, 2017

/s/ JOHN A. MENDEZ
John A. Mendez
United States District Judge